

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**OUTSOURCING FACILITIES  
ASSOCIATION, ET AL.,**

Plaintiffs,

v.

**No. 4:24-cv-953-P**

**UNITED STATES FOOD AND DRUG  
ADMINISTRATION, ET AL.,**

Defendants.

**IVIM HEALTH'S MOTION FOR LEAVE  
TO PROCEED WITHOUT LOCAL COUNSEL**

Pursuant to Local Rule 83.10(a) Ivim Health by and through its undersigned counsel files this Motion for Leave to Proceed without Local Counsel (the "Motion").

Ivim Health has sought leave to file an amicus brief in support of Plaintiffs' motion for a preliminary injunction. In connection with this filing, Ivim Health has retained María Amelia Calaf of Botkin Chiarello Calaf PLLC to serve as local counsel in this matter. Ms. Calaf is a longtime Texas-based practitioner, and a member in good standing of the Northern District of Texas. Local Rule 83.10 provides that local counsel is required in all cases where an attorney appearing in a case does not reside or maintain the attorney's principal office in this district. N. Dist. Tex. Local Rule 83.10. Per Local Rule 83.10(a), "local counsel" means a member of the bar or the court who resides or maintains the attorney's principal office in this district and whose residence or principal office is located within 50 miles of the courthouse in the division in which the case is pending. *Id.* Attorneys desiring to proceed without local counsel must obtain leave from the presiding judge. *Id.*

Ivim Health through Ms. Calaf and lead counsel, Goodwin Procter LLP, seek leave to proceed without local counsel as defined by Local Rule 83.10(1). While Ms. Calaf does not have an office within the district, she is a long-term member in good standing of this district and will be able to otherwise meet all the responsibilities of Fort Worth-area local counsel including those set forth in Local Rule 83.10(b). Moreover, the limited scope of amicus Ivim Health's involvement in this matter further supports the request for leave.

### **CONCLUSION**

For these reasons, Ivim Health respectfully requests that the Court grant Ivim Health's Motion for Leave to Proceed without Local Counsel, permitting leave to proceed without local counsel as defined by Local Rule 83.10(b).

Dated: February 3, 2025

Respectfully submitted,

/s/Maria Amelia Calaf

Brian Burgess

D.C. Bar No. 1020915

Goodwin Procter LLP

1900 N Street, NW

Washington, DC 20036

T: (202) 346-4215

F: (202) 346-4444

bburgess@goodwinlaw.com

*\*Pro Hac Vice* motion forthcoming

Maria Amelia Calaf

Botkin Chiarello Calaf

Texas State Bar. No. 24081915

1209 Nueces Street

Austin, TX 78701

T: (512) 213-6094

F: (737) 289-4695

mac@bccAustin.com

**ATTORNEYS FOR IVIM HEALTH**

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1(a) and (b), I certify that counsel for Amici conferred with counsel for both Plaintiffs and Defendants by email on February 3, 2025, to determine whether they oppose the relief sought by this Motion. Counsel for all parties informed counsel for Amici that they do not have a position on this Motion.

/s/ María Amelia Calaf  
María Amelia Calaf

**CERTIFICATE OF SERVICE**

I hereby certify that on February 3, 2025 a true and correct copy of the foregoing document has been filed via the court's ECF system and sent via e-mail to all counsel of record.

/s/ María Amelia Calaf  
María Amelia Calaf